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10 **UNITED STATES BANKRUPTCY COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**

13 **In re:**

14 **PG&E CORPORATION,**

15 **- and -**

16 **PACIFIC GAS AND ELECTRIC**  
17 **COMPANY,**

18 **Debtors.**

- 19 ☐ Affects PG&E Corporation  
20 ☐ Affects Pacific Gas and Electric Company  
21 ☒ Affects both Debtors

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF HEATHER FREE IN  
SUPPORT OF REORGANIZED DEBTORS'  
OBJECTION TO CLAIM NO. 2441 FILED  
BY DON WORRELL**

**Response Deadline: January 11, 2023,  
4:00 p.m. (Pacific Time)**

**Hearing Information If Timely Response  
Made:**

Date: January 25, 2023

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

**DECLARATION OF HEATHER FREE**

I, Heather Free, hereby declare and state:

1. I am a Human Resources Business Partner (“**HRBP**”) for Pacific Gas and Electric Company (PG&E), a position I have held since July 2013. I make this declaration based on my personal knowledge and, if called to testify, I could and would testify to the matters stated herein.

2. In July through December 2018, I was the HRBP for Electric Operations, which included the Los Padres team in the San Luis Obispo area. Former Distribution Supervisor – Electric Don Worrell was a member of that team. As an HRBP, I have access to the personnel records of employees and former employees at PG&E, including the records of Don Worrell and his then-supervisor, Dan Rizzo, the Division Superintendent, Los Padres – Field Operations South. Personnel records are kept in the ordinary course of PG&E’s business and are recorded contemporaneously with the events described therein.

3. I reviewed Mr. Worrell’s personnel file and confirmed that his dates of employment with PG&E are as follows: date of hire, May 21, 1984; most recent date of hire, July 15, 1987; and separation date, December 15, 2018.

4. Dan Rizzo was the Division Superintendent, Los Padres – Field Operations South and Mr. Worrell’s direct supervisor for a period of time. I reviewed the dates of employment for Mr. Rizzo. Mr. Rizzo was hired on September 3, 2013 and was voluntarily separated from his employment on October 18, 2018.

5. Diana Holbak, a former Human Resources Business Partner who conducted workplace investigations, conducted an investigation into a female Operating Clerk’s complaint about Mr. Worrell’s inappropriate comments. I met with Ms. Holbak and Scott Rose, Mr. Worrell’s skip-level supervisor, on or about October 18, 2018, to discuss Ms. Holbak’s findings. Mr. Rizzo was not present at this meeting, as October 18 was Mr. Rizzo’s last day of employment. After reviewing the findings, Mr. Rose and I agreed that Mr. Worrell’s employment should be terminated because Mr. Worrell had committed serious violations of PG&E’s policies and in order to protect subordinate female employees from any future comments or other misconduct. Mr. Rose and I sought approval for the termination from my superiors and his. Upon obtaining the approvals, Mr. Worrell was separated.

1           6.           I am not aware of any complaints made against Mr. Rizzo, including any complaints  
2 by Mr. Worrell.

3           7.           Mr. Worrell is not eligible for rehire.

4           8.           As a matter of policy, the Utility does not provide employment references. Employees  
5 are instructed to refer prospective employers to a third-party vendor which will confirm or deny the  
6 accuracy of any dates of employment supplied by the former employee. The third-party vendor does  
7 not provide additional information.

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9           I declare under penalty of perjury under the laws of the United States of America that the  
10 foregoing is true and correct.

11                       Executed this 29th day of November, 2022, at Oakland, California.

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13   /s/ Heather A. Free  
14   Heather A. Free  
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